

WEIL, GOTSHAL & MANGES LLP
 Alfredo R. Pérez, Esq. (AP 3629)
 700 Louisiana, Suite 1600
 Houston, TX 77002
 Telephone: (713) 546-5000
 Facsimile: (713) 224-9511
 Attorneys for the Reorganized Debtors

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

In re	:	
	:	Chapter 11
WORLDCOM, INC., et al.,	:	
	:	Case No. 02-13533 (AJG)
Reorganized Debtors.	:	(Jointly Administered)
	x	
INTERNAL REVENUE SERVICE OF THE UNITED STATES OF AMERICA,	:	
	:	07 Civ. 07414 (DLC)
Appellant,	:	
	:	
v.	:	
WORLDCOM, INC., et al.,	:	
	:	
Appellees.	:	
	:	
	x	

NOTICE OF MOTION FOR ADMISSION *PRO HAC VICE* FOR JAMES T. GROGAN

PLEASE TAKE NOTICE that at a date and time to be designated by the Court, the undersigned will move for an order pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York admitting James T. Grogan to practice *pro hac vice* during the pendency of this action or until further order of this Court.

Dated: Houston, Texas
September 7, 2007

Respectfully submitted,



Alfredo R. Pérez, Esq. (AP 3629)
WEIL, GOTSHAL & MANGES LLP
700 Louisiana, Suite 1600
Houston, TX 77002
Telephone: (713) 546-5000
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**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

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WORLDCOM, INC., et al.,	:	Chapter 11
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	:	Case No. 02-13533 (AJG)
	:	
Reorganized Debtors.	:	(Jointly Administered)
	x	
INTERNAL REVENUE SERVICE OF THE	:	
UNITED STATES OF AMERICA,	:	
	:	
Appellant,	:	07 Civ. 07414 (DLC)
	:	
v.	:	
	:	
WORLDCOM, INC., et al.,	:	
	:	
	:	
Appellees.	:	
	:	
	x	

MOTION FOR ADMISSION *PRO HAC VICE* FOR JAMES T. GROGAN

Alfredo R. Pérez (“Movant”), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States District Court for the Southern District of New York, and a member of Weil, Gotshal & Manges LLP, hereby moves the Court to enter an order permitting James T. Grogan to practice *pro hac vice* before the United States District Court for the Southern District of New York to represent Verizon Business Global LLC (successor by merger of reorganized debtor WorldCom, Inc.), as Appellee, in the appeal

numbered 07 Civ. 07414 (DLC) pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York. In support of the Motion, Movant states as follows:

1. Mr. Grogan is a member in good standing of the bars of the State of Texas, the Supreme Court of Texas, the United States District Courts for each of the Districts in Texas, and the Fifth Circuit Court of Appeals.

2. In support of the relief requested in this Motion, attached hereto as Exhibit A is the Affidavit of Movant in Support of this Motion for Admission *Pro Hac Vice* for James T. Grogan.

3. Also in support of this Motion, attached hereto as Exhibit B is a certificate of good standing from the bar of the State of Texas.

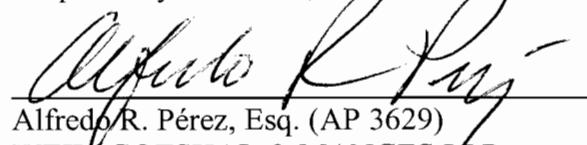
4. Movant requests that this Court approve this Motion so that Mr. Grogan may file pleadings and appear and be heard in the above-captioned appeal.

5. No previous request for the relief sought herein has been made to this Court.

WHEREFORE Movant respectfully requests that the Court enter an order permitting James T. Grogan to appear *pro hac vice* as counsel to Verizon Business Global LLC in the appeal captioned above and granting such other and further relief as is just. A proposed form of order is attached as Exhibit C.

Dated: Houston, Texas
September 7, 2007

Respectfully submitted,


Alfredo R. Pérez, Esq. (AP 3629)
WEIL, GOTSHAL & MANGES LLP
700 Louisiana, Suite 1600
Houston, TX 77002
Telephone: (713) 546-5000
Facsimile: (713) 224-9511

Attorneys for the Reorganized Debtors

WEIL, GOTSHAL & MANGES LLP
 Alfredo R. Pérez, Esq. (AP 3629)
 700 Louisiana, Suite 1600
 Houston, TX 77002
 Telephone: (713) 546-5000
 Facsimile: (713) 224-9511
 Attorneys for the Reorganized Debtors

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

In re	:	
	:	Chapter 11
WORLDCOM, INC., <u>et al.</u>	:	
	:	Case No. 02-13533 (AJG)
	:	
Reorganized Debtors.	:	(Jointly Administered)

INTERNAL REVENUE SERVICE OF THE UNITED STATES OF AMERICA,	:	
	:	07 Civ. 07414 (DLC)
Appellant,	:	
	:	
v.	:	
	:	
WORLDCOM, INC., <u>et al.</u>	:	
	:	
	:	
Appellees.	:	
	:	

State of Texas)
)
 County of Harris)

**AFFIDAVIT OF ALFREDO R. PEREZ IN SUPPORT OF
 MOTION FOR ADMISSION *PRO HAC VICE* FOR JAMES T. GROGAN**

ALFREDO R. PEREZ, being duly sworn, hereby deposes and says as follows:

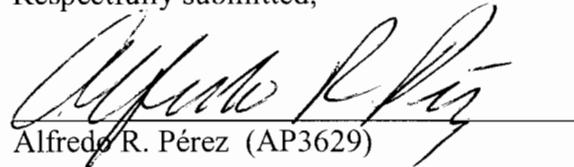
1. I am a member of Weil, Gotshal & Manges LLP, counsel for Verizon Business Global LLC (successor by merger of reorganized debtor WorldCom, Inc.), in the above captioned action. I am familiar with the proceedings of this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit James T. Grogan as counsel *pro hac vice* to represent Appellee in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on January 30, 2007. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing in this Court. I have been licensed to practice law in the State of Texas since 1980.
3. I have known James T. Grogan since 2002.
4. Mr. Grogan is an associate of Weil, Gotshal & Manges LLP, in Houston, Texas.
5. I have found Mr. Grogan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of James T. Grogan, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of James T. Grogan, *pro hac vice*, which is attached to the Motion as Exhibit C.

WHEREFORE it is respectfully requested that the motion to admit James T. Grogan, *pro hac vice*, to represent Appellee in the above captioned matter, be granted.

Dated: Houston, Texas
September 7, 2007

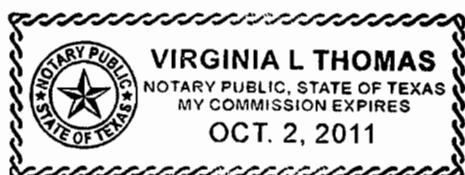
Respectfully submitted,



Alfredo R. Pérez (AP3629)



Virginia L. Thomas
Notary Public



The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, BLAKE HAWTHORNE, Clerk of the Supreme Court of Texas, certify that the records of this office show that

JAMES TILLMAN GROGAN III

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 1st day of November, 2000.

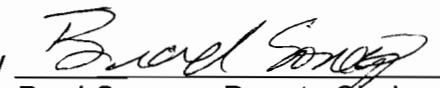
I further certify that the records of this office show that, as of this date

JAMES TILLMAN GROGAN III

is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my hand
and the seal of the Supreme Court of
Texas at the City of Austin, this 5th day
of September, 2007.

BLAKE HAWTHORNE, Clerk

by 
Brad Sonego, Deputy Clerk

No. 3716

Exhibit C

Proposed Order

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	Chapter 11
WORLDCOM, INC., <u>et al.</u>	:	
	:	Case No. 02-13533 (AJG)
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Reorganized Debtors.	:	(Jointly Administered)
	x	
INTERNAL REVENUE SERVICE OF THE UNITED STATES OF AMERICA,	:	
	:	
	:	07 Civ. 07414 (DLC)
Appellant,	:	
	:	
v.	:	
	:	
WORLDCOM, INC., <u>et al.</u>	:	
	:	
	:	
Appellees.	:	
	:	
	x	

**ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE FOR JAMES T. GROGAN**

Upon consideration of the motion seeking admission *pro hac vice* for James T. Grogan to represent Appellee Verizon Business Global LLC before the United States District Court for the Southern District of New York, IT IS HEREBY ORDERED that:

Applicant's Name: James T. Grogan

Firm Name: Weil, Gotshal & Manges LLP

Address: 700 Louisiana St., Ste. 1600
Houston, Texas 77002

Telephone/Fax: Telephone: 713/546-5000
Fax: 713/225-9511

Email Address: james.grogan@weil.com

is admitted to appear *pro hac vice* before this Court as counsel to Appellee Verizon Business Global LLC in the bankruptcy appeal number 07 Civ. 07414 (DLC).

Dated: New York, New York
_____, 2007

United States District Court Judge

CERTIFICATE OF SERVICE

I, Gayle E. Mitchel, certify that I caused a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* for James T. Grogan, to be served upon the party listed below via First-Class Mail and Electronic Mail on September 7, 2007.

Gayle E. Mitchel
Gayle E. Mitchel

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for the Southern District of New York
Attn: Benjamin H. Torrance, Esq.
Danna Drori, Esq.
Assistant United States Attorneys
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